UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Joseph A. Dickson

:

V.

Mag No. 11-6501

:

HALEEM McCOY,

CRIMINAL COMPLAINT

a/k/a "Hollar"

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Sandra Sanchez, Special Agent Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, January $_$, 2011, at Newark, New Jersey

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

Attachment A

COUNT ONE

On or about May 7, 2010, in Union County, in the District of New Jersey and elsewhere, defendant

HALEEM McCOY,
 a/k/a "Hollar,"

did knowingly and intentionally distribute and possess with intent to distribute 28 grams or more of a mixture or substance which contained cocaine base, that is "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a) & (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWO

On or about May 7, 2010, in Union County, in the District of New Jersey and elsewhere, defendant

HALEEM McCOY,
 a/k/a "Hollar,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court of the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely a Tanfoglio GT-32 .32 caliber semi-automatic pistol bearing serial number C67330.

In violation of Title 18, United States Code, Section 922(q)(1).

Attachment B

- I, Sandra Sanchez, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon my investigation, review of reports and discussions with other law enforcement personnel and others. All statements herein are set forth in substance and in part:
- 1. Beginning in or around May 2009, a confidential informant ("CI"), with a proven record of reliability and credibility, provided information that defendant HALEEM McCOY, a/k/a "Hollar," belonged to a criminal street gang known as the "G-Shine Bloods."
- 2. On or about May 6, 2010, the CI, acting under the direction and supervision of law enforcement, met defendant HALEEM McCOY, a/k/a "Hollar," to arrange for the purchase of a quantity of crack cocaine and a .32 caliber firearm. Defendant McCOY instructed the CI to telephone a co-conspirator ("CC-1") to confirm the purchase.
- 3. On or about May 7, 2010, the CI, acting under the direction and supervision of law enforcement, telephoned CC-1 and advised that the CI wanted "both" from defendant HALEEM McCOY, a/k/a "Hollar." The telephone call was consensually audiorecorded and monitored by law enforcement.
- 4. On or about that same day, defendant HALEEM McCOY, a/k/a "Hollar," called the CI and advised the CI to wait at a location in Plainfield, New Jersey. The phone call was monitored by law enforcement. Later that day, defendant McCOY sent the CI a text message with a final meeting location in Plainfield, New Jersey.
- 5. On or about that same day, defendant HALEEM McCOY, a/k/a "Hollar," and an unidentified co-conspirator ("CC-2") met with the CI at the prearranged location. At that final location, the CI handed defendant McCOY approximately \$3,200.00, and defendant McCOY, in turn, handed the CI a clear, plastic baggie containing a white rock-like substance and a Tanfoglio GT-32 .32 caliber semi-automatic pistol bearing serial number C67330. This transaction was consensually video and audio-recorded.
- 6. The white-rock like substance field-tested positive for the presence of cocaine and weighed approximately 83.3 grams. Subsequent laboratory tests indicate that the white-rock like substance contained a net weight of 56 grams of cocaine base.
 - 7. On or about June 8, 2004, defendant HALEEM McCOY, a/k/a

"Holler," was convicted in the New Jersey Superior Court for Union County of possession of a controlled dangerous substance within 1000 feet of a school, in violation of N.J.S.A. 2C:35-7, a crime punishable by a term of imprisonment exceeding one year.

8. The firearm recovered from defendant HALEEM McCOY, a/k/a "Holler," namely, a Tanfoglio .32 caliber semi-automatic pistol bearing serial number C67330, is manufactured outside of New Jersey.